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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 **FEDERAL TRADE COMMISSION,**

13 Plaintiff,

14 v.

15 **CONSUMER DEFENSE, LLC, *et al.*,**

16 Defendants.

17  
18 **Case No. 2:18-cv-00030-JCM-BNW**

19 **STIPULATION TO EXTEND**  
20 **DEADLINE FOR DISPOSITIVE**  
21 **MOTIONS**

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COME NOW, the Defendants, CONSUMER DEFENSE, LLC; CONSUMER LINK,  
INC. AMERICAN HOME LOAN COUNSELORS; AMERICAN HOME LOANS, LLC;  
CONSUMER DEFENSE GROUP, LLC F/K/A MODIFICATION REVIEW BOARD, LLC;  
BROWN LEGAL, INC.; FMG PARTNERS, LLC; ZINLEY, LLC; JONATHAN P. HANLEY;  
AND SANDRA X. HANLEY, by and through their attorney of record, and the Plaintiff,  
FEDERAL TRADE COMMISSION, by and through its attorneys of record, and hereby  
stipulate, agree and seek this Court's Order as follows:

- 29 1. On January 8, 2018, the FTC filed a complaint for permanent injunction and other equitable  
30 relief against individuals Jonathan Hanley, Benjamin Horton1, and Sandra Hanley, and  
31 against the entities Consumer Defense, LLC (Nevada), Consumer Link, Inc. (the "Nevada  
32 Corporate Defendants"), Preferred Law, PLLC, American Home Loan Counselors,  
33 Consumer Defense Group, LLC, Consumer Defense, LLC (Utah), Brown Legal, Inc., AM

1 Property Management, LLC, FMG Partners, LLC, and Zinly, LLC (the “Utah Corporation  
2 Defendants”) (all collectively the “Corporate Defendants”) . (ECF No. 1.)  
3 2. The current Scheduling Order in this case calls for the filing of all dispositive motions on or  
4 before July 15, 2019. (ECF 171.)  
5 3. On June 5, 2019, D. Brian Boggess entered his Notice of Appearance as Counsel for all of  
6 the Defendants, including the Corporate Defendants. (ECF No. 233.)  
7 4. At the time Counsel entered his appearance, various discovery-related Motions were pending  
8 before the Court, including Defendants’ Emergency Motion to Extend Time Discovery. (ECF  
9 216.) That Motion, as well as other pending Motions, has now been set for Hearing before  
10 the Court. (ECF 244.)  
11 5. Counsel for Defendants has a conflict during the week of July 8, 2019, wherein he will be  
12 outside the reach of cellular phones and the internet while participating in a previously-  
13 scheduled fifty-mile backpacking trip with a group of scouts.  
14 6. Given Counsel’s conflict, and the upcoming hearing on the outstanding discovery motions,  
15 the parties agree, stipulate and request that this Court extend the due date for Defendants to  
16 file dispositive motion to July 22, 2019.  
17 7. Oppositions and replies, if any, would be due pursuant to the applicable Federal Rules of  
18 Civil Procedure and the Local Rules of this Court.

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1       8. This stipulation is made in good faith among and at the request of the parties, and not for  
2                   purposes of delay.

3                   BOGGESSION LAW GROUP

4                   ALDEN F. ABBOTT  
5                   General Counsel

6                   */s/D. Brian Boggess*

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13                  *Attorney for Defendants*

14                  */s/Gregory A. Ashe (with permission)*

15                  GREGORY A. ASHE  
16                  JASON SCHALL  
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24                  NICHOLAS A. TRUTANICH  
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5                  *Attorneys for Plaintiff*  
6                  FEDERAL TRADE COMMISSION

7                  **IT IS SO ORDERED** this 2nd day of July, 2019.

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9                  Honorable Brenda Weksler  
10                 United States Magistrate Judge